REPLACED DECEMBER 4, 1985

RCRA Part B Permit Application United Technologies Pratt & Whitney CTD 990672081 Page 1 of 212

RCRA RECORDS CENTER

FACILITY Prot & Whitney - Main St
I.D. NO. CTD990672081

FILE LCC. R-113

OTHER RDMS #2708

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General Facility Description (Cont'd)

The manufacturing and developing of jet engines is a high technology industry often using "state of the art" materials and processes. Hazardous wastes are generated at this site by fabricating, cleaning, finishing, coating, testing and research operations.

The hazardous wastes generated at this site are typically water solutions, both concentrated and dilute, containing acids, alkalies, and heavy metals. There are also spent solvents and associated still bottoms generated from production operations and reclamation operations.

Hazardous wastes are also received at the East Hartford complex from other Pratt & Whitney sites. These wastes are also concentrated waste water solutions and spent solvents. All the wastes received at East Hartford are similar or identical to those generated at East Hartford. These off site wastes are often combined with similar on-site wastes for storage.

Hazardous waste activities at this site are reclamation, transportation, storage and treatment. Recycling is the distillation of spent listed solvents which are primarily generated on-site. P&W has a Hazardous Waste Management Permit (CT-HW-264) issued by the Connecticut Department of Environmental Protection for transportation of hazardous waste. P&W transportation of hazardous wastes occurs only between P&W facilities although licensed waste haulers may also be used. Storage occurs for both on-site and off-site material while awaiting treatment or shipment to licensed waste disposal facilities. Treatment can be separated into two main categories. They are waste water solutions processed in our NPDES facility and those which are incinerated.

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General Facility Description (Cont'd)

application is being prepared for submission to both the This U.S. Environmental Protection Agency (EPA) and the Connecticut Department of Environmental Protection (DEP). Currently the DEP has been delegated Phase II authority and expects to receive final authorization during Although both EPA and DEP regulations are substantially equal there are a few differences in the scope of activities covered in the The EPA excludes elementary neutralization or permitting program. wastewater treatment units under 40 CFR 264.1(g)(6) and 40 CFR 122.21 (d)(2)(vi) for all treatment and most storage tanks at this site. The DEP however requires that all storage tanks which receive off site wastes be included in the application. See Table A-1 for a list of storage tanks at this site and the applicable regulatory program(s). Also included in this application are a liquid injection incinerator, a storage building and a transporter storage pad.

P&W filed a "Notification of Hazardous Waste Activity", dated August 13, 1980 and a "RCRA Part A Application" dated November 18, 1980. The Part A application was later ammended by a submittal, dated November 19, 1981, to include a rotary kiln incinerator with the required justification. The rotary kiln incinerator is no longer scheduled to burn any hazardous waste and has not been included in this application.

The Part A has again been revised to remove the excluded treatment tanks and the rotary kiln incinerator for the reasons discussed in the preceding paragraphs and is in Appendix I.

The solvent reclamation operation at this site includes the distillation of tetrachloroethylene and 1,1,1-trichloroethane. These spent solvents are generated primarily from degreasing operations on site.

ship the waste, otherwise additional information or analysis will be requested. When it arrives at East Hartford, the waste will be inspected to see that it meets the description provided on the P&W Internal Waste Manifest and the Hazardous Waste Manifest (if required). At this point the operator will accept the waste and place it in storage, but he may request additional information about the waste from the branch plant before the waste is disposed.

III Waste Descriptions

A) Table B-1 provides one example for each general waste type, stating the solutions original composition as found in the Process Solutions manual. As previously mentioned, the composition of a waste solution will be essentially the same as the original Process Solution. Information such as this is available for each of the hazardous wastes mentioned below. Annual volumes for each waste are available in the 1983 Facility Biennial Hazardous Waste Report presented in Appendix IV.

B) Acids

P&W uses several acids in its production processes. The resulting acid wastes are spent acid/water solutions of varying concentrations. Acid wastes are treated by neutralization, after which the neutralized solution flows to a final treatment plant for metal removal.

ISSUED:

October, 1983

ROUTINE JOB NO. 623

FREQUENCY: DAILY, WEEKLY, AND WHEN IN USE

TREATMENT PLANT OPERATOR

NAME_

CLOCK#

ØATE TIME REQUIRED

FOREMAN

INSPECTION GUIDE Liquid Incinerator

SAFETY: COMPLY WITH ALL CURRENT SAFETY PRECAUTIONS.

CHECK POINTS:

Daily

1. Pipelines, valves pumps

2. Gas Lines

3. Scrubber systemy

ALL AREAS

REAS DEFICIENCY REPORT

Check lines, valves and pumps from tanks to incinerator nozzles for leaks, cracks or signs of deterioration.

Check gas lines from the meter to the burners for signs of leaks cracks or deterioration.

Check scrubber system for leaks, corrosion, pH and solution contamination.

Daily when incinerator is running

1. Incinerator on exhaust duct work

Check system for fugitive emissions and duct deterioration.

Weekly when incinerator is running

Safety control systems.

Check for proper operation of incinerator shutdown.

SECTION - G - GENERAL HAZARDOUS WASTE FACILITY PROCEDURES

- I Procedures Structures and Equipment
 - A) Prevention of Unloading Hazards Concentrated Waste Treatment Plant Storage Building
 - Tankers are loaded and unloaded on concrete loading pads which are as large as a tanker and sloped to a containment pit with the capacity to contain the contents of the tanker as well as precipitation from a 25 year 24 hour storm. There are three pads in use separated into the categories of Acids, Alkali and Cyanide, and Oil. Any spills onto the pads are washed down into the containment area, which is then pumped to a treatment tank and treated accordingly. A bypass exists to direct rainwater from the pads directly to a storm sewer, and procedures call for this bypass to be closed at all times when pads are in use.
 - 2) Drums, strapped to pallets, are loaded and unloaded directly from trucks into the building at a truck dock on the west side of the storage building. The building has several containment areas built under the floor, and the floors are sloped so that all spills are directed into containment. The containment pits must be pumped out manually into the treatment tanks and treated as required.
 - 3) Transporters are unloaded onto specially constructed platforms on the south side of the building. When placed on the platform, the transporter slopes

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TABLE J-1

CLOSURE PLAN SUMMARY

CWTP

EAST HARTFORD, CONNECTICUT

| <u>I TEM</u> | <u>PROCESS</u> | PROCESS CODE | MAXIMUM INVENTORY* | CLOSURE OPTIONS PARTIAL/ULTIMATE | SCHEDU FOR ULTIMATE START**/C | E CLOSURE | METHOD (SEE SECTION REFERENCE) |
|--------------|-------------------------------|-----------------|-----------------------|--|-------------------------------------|-----------|--------------------------------------|
| 1 | Barrel Storage | S01 | 47,520 55,000 Gal. | x | January | June | V |
| 2 | Transporter Storage | S01 | 9,000 Gal. | X | January | June | V |
| 3 | Barrel/Transporter Storage | S01 | 4,840 Gal. | X | January | June | V |
| 4 | Tank Storage (CWT Area) | \$02 | 27,300 Gal. | X | January | June | III |
| 5 | Incinerator | T03 | 900 Gal. | x | April | Sept. | IV |

^{*} For continuous processes, one maximum volume of units is reported

^{**} Assumed start date. Completion date based on estimated time of performance of closure

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Sub Total = \$ 3,900.

Closure Plan (Cont'd)

TABLE J-3

CONTAINER STORAGE AREAS

| Step | 1 | Removal of Containerized Wastes | |
|-------|-----|--|------------------------|
| | Α. | Disposal - \$100/drum | |
| | | 1000 drums barrel storage area | = \$100,000. |
| | | 164 drums transporter storage area | = 16,400. |
| | | 88 drums barrel/transporter storage area | = 8,800. |
| | | | \$135,200. |
| | В. | Labor - \$200/Man-day | = 14,300 |
| | ٥. | Labor - \$200/Plati-day | Sub Total = \$139,500. |
| | | | |
| Steps | 2 - | 3 Rinsing | |
| | _ | | |
| | Α. | Disposal | |
| | | estimate 100 drums rinse water | = 10,000 |
| | В. | Sampling/Analysis (100 drums @ \$100 each) | = 10,000 |
| | C. | Labor | = 2,200 |
| | D. | Equipment | = 1,000 |
| | | | Sub Total = \$ 23,200. |
| Steps | 4 - | 5 Decontamination | |
| | Α. | Labor | = 2,200 |
| | В. | Testing, Analysis | = 1,000 |
| | | 10 samples @ \$100 each | |
| | C. | Certification | = 700 |

SECTION - L - FINANCIAL ASSURANCE AND LIABILITY INSURANCE

The following financial documentation is contained in this section:

- I A letter from UTC's Director of Environmental Affairs, M. J. Schneidermeyer, transmitting financial documentation to the DEP, dated October 22, 1984.
- II A letter from UTC's chief financial officer S. B. Brown, Executive Vice President - Finance and Administration, dated October 18, 1984.
- III Exhibit A: UTC Hazardous Waste Management Facility Closure and Post-Closure Care Costs by State, dated October 18, 1984.
- IV A special report by Price Waterhouse, independent certified public accountant, dated October 19, 1984.
- V A certificate of liability insurance from Liberty Mutual dated September 16, 1982.

The United Technologies 1983 Annual Report, including our independent certified public accountant's report on examination, which is referenced in the above material, is included in Appendix II of this application.



United Technologies Building Hartford, Connecticut 06101 203/728-7000

RCRA Part B Permit Application United Technologies Pratt & Whitney CTD 990672081

22 October 1984

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CERTIFIED MAIL

Connecticut Department of Environmental Protection Hazardous Waste Management Section 165 Capitol Avenue Hartford, CT 06106

Attention: Financial Documentation Enclosed

Dear Sir:

As a result of the Part B revised closure and post closure costs at the Pratt & Whitney East Hartford and Middletown facilities, enclosed please find revised evidence of United Technologies Corporation (UTC) hazardous waste management facility Financial Requirements submitted under your state hazardous waste management regulations for the following facilities:

CTD000844399, Pratt & Whitney, Colt St., East Hartford CTD990672081, Pratt & Whitney, Main St., East Hartford CTD000845131, Pratt & Whitney, Pent Rd., East Hartford CTD000844324, Pratt & Whitney, Manchester CTD003935905, Pratt & Whitney, Middletown CTD001449511, Pratt & Whitney, North Haven CTD000844407, Pratt & Whitney, Rocky Hill CTD001149277, Pratt & Whitney, Aircraft Rd., Southington CTD000844332, Pratt & Whitney, Newell St., Southington CTD010166791, Power Systems, South Windsor CTD010166791, Hamilton Standard, Windsor Locks CTD089623318, Norden, Norwalk CTD001449735, Sikorsky, Bridgeport CTD001449784, Sikorsky, Stratford CTD095532131, UT Research Center, East Hartford

This evidence includes:

- An 18 October 1984 letter from UTC's chief financial officer S. B. Brown.

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- Exhibit A: UTC Hazardous Waste Management Facility Closure and Post-Closure Care Costs by State dated 18 October 1984.
- UTC Annual Report 1983, including our independent certified public accountant's report on examination.
- A special report by Price Waterhouse, independent certified public accountant.

Please do not hesitate to contact me if additional information is needed to evidence UTC's compliance with your Financial Requirements.

Respectfully submitted,

Melvin J. Schneidermeyer

Director of Environmental Affairs

MJS/mlw Enclosures





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October 18, 1984

Connecticut Department of
Environmental Protection
Hazardous Waste Management Section
165 Capitol Avenue
Hartford, CT 06106

Attention: Financial Documentation Enclosed

Dear Sir:

I am the chief financial officer of United Technologies Corporation, United Technologies Building, Hartford, CT 06101. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities which are located in the State of Connecticut for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

See Exhibit A attached hereto. Facilities of the Corporation are designated "division".

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

See Exhibit A attached hereto. Facilities of subsidiaries are designated "subsidiary".

3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or quarantor, is demonstrating financial

assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

For the following states, see Exhibit A for a list of facilities in:

California
Colorado
Florida
Illinois
Indiana
Maine
Michigan
Mississippi
New Jersey
North Carolina
Ohio
Texas

4. This firm is the owner or operator of the following hazardous waste management facility for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimate not covered by such financial assurance is shown for this facility: NONE.

This firm is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December, 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1983.

ALTERNATIVE II

| 1. | Sum of current closure and post- closure cost estimates | \$5,614,911 |
|-------------|--|-----------------|
| 2. | Current bond rating of most recent issuance Name of rating service | Aa3 Moody's |
| 3. | Date of issuance of bond | Nov. 15, 1982 |
| 4. | Date of maturity of bond | Nov. 15, 2012 |
| *5. | Tangible net worth | \$3,212,502,000 |
| *6. | Total assets in U.S. | \$6,340,520,000 |
| 7. | Is line 5 at least \$10 million? | Yes |
| 8. | Is line 5 at least 6 times line 1? | Yes |
| * 9. | Are at least 90% of the firm's assets located in the U.S.? | No |
| 10. | Is line 6 at least 6 times line 1? | Yes |

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) (except that references to federal agencies have been changed to state equivalents) as such regulations were constituted on the date shown immediately below.

Stillman B. Brown

Executive Vice President - Finance and Administration and Chief Financial Officer

United Technologies Corporation

Date: October 18, 1984

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EXHIBIT A

18 October 1984 Prepared by MJS

UNITED TECHNOLOGIES CORPORATION
HAZARDOUS WASTE MANAGEMENT FACILITY
CLOSURE AND POST-CLOSURE CARE COSTS INFLATED TO 19 MAY 1984
BY STATE

(RCRA Parts 264 and 265 Subpart H)

Key:

STATE WITH UTC FACILITY (IES)

- 1. U.S. EPA Identification Number
- 2. Facility Name
- 3. Address
- 4. Authorized State agency or U.S. EPA Region
- 5. Type of Facility or U.S. EPA Region
- 6. 19 May 1981 Closure/Post-Closure Cost (in 1981 dollars)
- 7. 19 May 1982 Adjusted Closure/Post-Closure Cost (1.09 x 1981 cost)
- 8. 19 May 1983 Adjusted Closure/Post-Closure Cost (1.06 x 1982 cost)
- 9. 19 May 1984 Adjusted Closure/Post-Closure Cost (1.04 x 1983 cost)

--- CLOSURE COSTS ---

CALIFORNIA

- 1. CAD044433613
- 2. Hamilton Standard HSS O&R Facility (Division)
- 3. 4401 Donald Douglas Drive Long Beach, CA 90808
- 4. Department of Health Services
- 5. Storage
- 6. \$4,000
- 7. \$4,360
- 8. \$4,622
- 9. \$4,807

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- 1. CAD001705235
- Chemical Systems Division/Coyote Center (Division)
- 600 Metcalf Road San Jose, CA 95138
- 4. DHS
- 5. Storage and treatment (includes surface impoundments)
- 6. \$165,000
- 7. \$360,000 (revised to 19 May 1983 dollars)
- 8. \$360,000
- 9. \$374,400
- 1. CAD001868652
- Inmont Corporation (Subsidiary)
- 3. 1244 North Lemmon Street Anaheim, CA 92801
- 4. DHS
- Storage
- 6. \$13,447
- 7. \$14,657
- 8. \$15,536
- 9. \$16,157

COLORADO

- 1. COD000716597
- Mostek Corporation (Subsidiary)
- 1575 Garden of the Gods Road Colorado Springs, CO 80907
- 4. Region VIII
- 5. Storage
- 6. \$14,360
- 7. \$19,632 (revised to 19 May 1983 dollars)
- 8. \$38,000 (revised November 1983)
- 9. \$39,520

CONNECTICUT

- 1. CTD000844399
- Pratt & Whitney Aircraft Group (Division)
- 3. Colt Street
 - East Hartford, CT 06108
- 4. Department of Environmental Protection
- 5. Storage and treatment (includes surface impoundments)
- 6. \$100,000
- 7. \$109,000
- 8. \$115,540
- 9. \$120,162

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- CTD990672081
- Pratt & Whitney Aircraft Group (Division) 2.
- 3. 400 Main Street East Hartford, CT 06108
- 4. DEP
- 5. Storage and treatment
- \$290,000 revised 6.
- 7. \$316,100 revised
- 8. \$335,066 revised
- 9. \$348,469 revised
- CTD000845131
- Pratt & Whitney Aircraft Group (Division)
- Pent Road (Willgoos) East Hartford, CT 06108
- DEP 4.
- 5. Storage
- \$3,000 6.
- 7. \$3,270
- \$3,466 8.
- 9. \$3,605
- 1. CTD000844324
- Pratt & Whitney Aircraft Group (Division) 2. Pine Street

Manchester, CT 06040

- DEP 4.
- 5. Storage
- 6. \$4,500
- 7. \$4,905
- 8. \$5,199
- 9. \$5,407
- CTD003935905
- Pratt & Whitney Aircraft Group (Division)
- Aircraft Road Middletown, CT 06457
- 4. DEP
- Storage and disposal (includes surface impoundments) 5.
- \$280,000 6.
- 7. \$305,200
- 8. \$323,512
- \$977,080 revised

(Also, see page 10 for post-closure cost at this site)

- 1. CTD001449511
- 2. Pratt & Whitney Aircraft Group (Division)
- 415 Washington Avenue North Haven, CT 06473
- 4. DEP
- 5. Storage (includes surface impoundments)
- 6. \$480,000
- \$523,200 7.
- 8. \$554,592
- 9. \$576,776

8.

9.

\$670,132

\$696,937

-4-

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1.
   CTD000844407
2.
    Pratt & Whitney Aircraft Group (Division)
З.
    Dividend Road
    Rocky Hill, CT 06067
4.
    DEP
5.
    Storage
    $1,000
6.
7.
   $1,090
   $1,155
8.
   $1,201
9.
1.
   CTD001149277
2.
   Pratt & Whitney Aircraft Group (Division)
   Aircraft Road
   Southington, CT 06489
4.
5.
   Storage (includes surface impoundments)
   $60,000
6.
7.
   $65,400
8.
   $69,324
   $72,097
9.
1.
   CTD000844332
   Pratt & Whitney Aircraft Group (Division)
2.
   Newell Street (Service Center)
3.
   Southington, CT 06489
4.
   DEP
5.
   Storage (includes surface impoundments)
   $115,000
6.
   $125,350
7.
   $132,871
8.
9.
   $138,186
1.
   CTD010166791
2. Power Systems Division/Fuel Cell Operations (Division)
3.
   P.O. Box 109
   South Windsor, CT 06074
4.
   DEP
5.
   Storage and treatment
6.
   $6,450
7.
   $7,031
8.
   $7,453
9.
    $7,751
   CTD001145341
1.
   Hamilton Standard Complex B-1, 2 and 3 (Division)
2.
3.
    Hamilton Road
    Windsor Locks, CT 06096
4.
5.
    Storage and treatment (includes surface impoundments with
    closure in 1984)
6.
    $580,000
7.
   $632,200
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-5-

1. CTD089623318 Norden Systems (Subsidiary) 2. 3. Norden Place Norwalk, CT 06856 4. DEP 5. Storage and treatment 6. \$12,250 7. \$13,353 \$14,154 8. 9. \$14,720 1. CTD001449735 Sikorsky Aircraft Bridgeport Plant (Division) South Avenue 3. Bridgeport, CT 06604 4. DEP 5. Storage \$17,000 6. 7. \$18,530 8. \$19,642 9. \$20,428 1. CTD001449784 Sikorsky Aircraft (Division) 2. 3. North Main Street Stratford, CT 06602 4. DEP 5. Storage and treatment (includes surface impoundments) 6. \$145,000 7. \$158,050 \$167,533 8. 9. \$174,234 1. CTD095532131 2. United Technologies Research Center (Division) 3. Silver Lane East Hartford, CT 06108 4. DEP 5. Storage 6. \$10,000 7. \$10,900 \$11,554 8. 9. \$12,016

FLORIDA

- 1. FLD001447952
- Pratt & Whitney Aircraft (Division)
- 3. P.O. Box 2691
 - West Palm Beach, FL 33402
- 4. Department of Environmental Regulation
- 5. Storage and treatment
- 6. \$533,000 (revised)
- 7. \$580,970 (revised)
- 8. \$615,828 (revised)
- 9. \$640,461

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ILLINOIS

- 1. ILD005059340
- Inmont Corporation (Subsidiary)
- 3. 3030 West 51st Street Chicago, IL 60632
- 4. Illinois Environmental Protection Agency

- 5. Storage
- 6. \$19,085 (for 17 May rather than 19 May in Illinois only)
- 7. \$20,803
- 8. \$22,051
- 9. \$22,933

INDIANA

- 1. IND000816108
- Components Division/Columbia City, Division of Essex Group, Inc. and part of UTC Automotive Group (Subsidiary)
- P.O. Box 1500
 Fort Wayne, IN 46801
- 4. EMB
- 5. Storage and treatment
- 6. \$66,000
- 7. \$71,940
- 8. \$76,256
- 9. \$79,306
- 1. IND061561775
- Components Division/Jeffersonville, Division of Essex Group, Inc. and part of UTC Automotive Group (Subsidiary)
- 3. P.O. Box 808
 Jeffersonville, IN 47130
- 4. EMB
- 5. Storage and treatment
- 6. \$3,000
- 7. \$3,270
- 8. \$3,466
- 9. \$3,605

MAINE

- 1. MED000791681
- Pratt & Whitney Aircraft Group (Division)
- 3. P.O. Box 455

North Berwick, ME 03906

- 4. Department of Environmental Protection
- 5. Storage
- 6. \$60,000
- 7. \$40,000 (revised)
- 8. \$42,400
- 9. \$112,000 (revised)

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.

MICHIGAN

- 1. MID001868538
- Inmont Corporation (Subsidiary)
- 3. 5935 Milford Avenue Detroit, MI 48210
- 4. DNR
- 5. Storage
- 6. \$34,890
- 7. \$38,030
- 8. \$40,312
- 9. \$41,924
 - 1. MID077883767
 - Inmont Corporation (Subsidiary)
 - 1700 Caniff Hamtramck, MI 48212
 - 4. DNR
 - 5. Storage
 - 6. \$24,595
 - 7. \$26,809
 - 8. \$28,418
 - 9. \$29,555

MISSISSIPPI

- 1. MSD004010724
- American Bosch Electrical Products, Divison of Ambac Industries, Inc. (Subsidiary)
- 3. P.O. Box 2228 Columbus, MS 39701
- 4. Department of Natural Resources
- 5. Storage
- 6. \$20,000 (revised)
- 7. \$21,800
- 8. \$23,108
- 9. \$24,032

NEW JERSEY

- 1. NJD082988056
- 2. Inmont Corporation (Subsidiary)
- James Street Belvidere, NJ 07823
- 4. BHWM
- 5. Storage
- 6. \$21,714
- 7. \$23,668
- 8. \$25,088
- 9. \$26,092

-8-

- 1. NJD002444958
- 2. Inmont Corporation (Subsidiary)
- L-5 Factory Lane Bound Brook, NJ 08805
- 4. BHWM
- 5. Storage
- \$27,170 6.
- 7. \$29,615
- \$31,392 8.
- 9. \$32,648
- 1. NJD002165371
- Inmont Corporation (Subsidiary)
- 150 Wagaraw Road Hawthorne, NJ 07506
- 4. BHWM
- 5. Storage
- 6. \$16,170
- 7. \$17,625
- 8. \$18,683
- 9. \$19,430
- NJD001288711 1.
- 2. Inmont Corporation (Subsidiary)
- 3. 200 Gregg St Lodi, NJ 07644
- 4. BHWM
- 5. Storage
- \$7,480 6.
- 7. \$8,153
- \$8,642 8.
- \$8,988

NORTH CAROLINA

- NCD990686168
- 2. Inmont Corporation (Subsidiary)
- 1300 Westinghouse Blvd. Charlotte, NC 28217
- 4. Department of Human Resources
- 5. Storage
- \$21,354 6.
- 7. \$23,276
- \$24,673 8.
- 9. \$25,660
- 1. NCD049997786
- Inmont Corporation (Subsidiary) Highway 70 West 2.
- Morganton, NC 28655
- 4. DHR
- 5. Storage
- \$36,861 6.
- \$40,178 7.
- 8.
- \$42,589

OHIO CTD 990672081

- 1. OHD000720607 (Ohio EPA Permit Number 00-60-0203)
- Automotive Products Division/Linden Ave. Facility, Division of Essex Group, Inc. (Subsidiary)

-9-

- 2200 Linden Avenue
 Zanesville, OH 47305
- 4. Ohio EPA
- 5. Storage and treatment
- 6. \$6,256
- 7. \$6,819
- 8. \$7,228
- 9. \$7,517
- 1. OHD004236816 (Ohio EPA Permit Number 05-31-0101)
- Inmont Corporation (Subsidiary)
- 1720-1754 Dana Avenue Cincinnati, OH 45207
- 4. Ohio EPA
- 5. Storage
- 6. \$34,986
- 7. \$38,135
- 8. \$40,423
- 9. \$42,040
- 1. OHD004236873 (Ohio EPA Permit Number 05-31-0514)
- Inmont Corporation (Subsidiary)
- 4700 Paddock Road Cincinnati, OH 45229
- 4. Ohio EPA
- 5. Storage
- 6. \$3,935
- 7. \$4,289
- 8. \$4,546
- 9. \$4,728
- 1. OHDO76796887 (Ohio EPA Permit Number 05-19-0054)
- Inmont Corporation (Subsidiary)
- State Route 571 East Greenville, OH 45331
- 4. Ohio EPA
- 5. Storage
- 6. \$31,840
- 7. \$34,706
- 8. \$36,788
- 9. \$38,260

TEXAS

- TXD047830443 (Texas TDWR Registration Number 30362)
- Mostek Corporation (Subsidiary)
- 1215 West Crosby Road Carrollton, TX 75006
- 4. Department of Water Resources
- 5. Storage and treatment
- 6. \$100,000
- 7. \$109,000
- 8. \$115,540
- 9. \$120,162

--- POST-CLOSURE COST ---

CONNECTICUT

- CTD003935905
- Pratt & Whitney Aircraft Group (Division) 2.
- 3. Aircraft Road Middletown, CT 06457
- DEP
- 5. Disposal (includes a landfill)
- 6. \$572,000 revised October 1984 in third quarter 1980 dollars
- 7. \$623,480
- 8. \$660,889 9. \$687,324
- (Also, see page 3 for closure cost at this site)

TOTAL: UNITED TECHNOLOGIES CORPORATION

SUB-TOTAL Closure Costs:

- 1. Number of Facilities:
- Sub-Total 19 May 1984 Closure Costs*: = \$4,927,5878.

SUB-TOTAL Post Closure Costs:

- 1. Number of Facilities: (1)
- Sub-Total 19 May 1984 Post-Closure Cost: = \$ 687,324

TOTAL Closure and Post-Closure Costs:

- 38 1. Number of Facilities:
- = \$5,614,911TOTAL 19 May 1984 COSTS: 8.

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ONE FINANCIAL PLAZA HARTFORD. CONNECTICUT 06103 203 525-4600

October 19, 1984

Mr. Melvin J. Schneidermeyer Director of Environmental Affairs United Technologies Corporation United Technologies Building Hartford, Connecticut 06101

Dear Mel:

As requested, enclosed is our letter report in connection with the requirements of the Environmental Protection Agency - Subpart H of 40 CFR, Parts 264 and 265.

Sincerely,

George E. Minnich

Enclosure - As stated

cc w/enclosure:

James T. Healey, Esq.
Charles B. Preston
United Technologies Corporation



ONE FINANCIAL PLAZA HARTFORD, CONNECTICUT 06103 203 525-4600

October 19, 1984

To the Board of Directors of United Technologies Corporation

We have examined the consolidated financial statements of United Technologies Corporation and subsidiaries (the "Corporation") as of December 31, 1983 and for the year then ended and have issued our report thereon dated January 25, 1984. We have not examined any financial statements of the Corporation as of any date or for any period subsequent to December 31, 1983.

Reference is made to the letter dated October 18, 1984 to the Connecticut Department of Environmental Protection from Mr. Stillman B. Brown, Executive Vice President - Finance and Administration and Chief Financial Officer of United Technologies Corporation (the "Letter"). We have compared the amounts listed below and included in the Letter to the corresponding amounts included in the aforementioned consolidated financial statements and found such amounts to be in agreement.

| Description | Amount (000's) |
|---|------------------|
| Tangible net worth at December 31, 1983 | \$ 3,212,502 (1) |
| Total assets in U.S. at December 31, 1983 | 6,340,520 (2) |

- (1) Shareowners' Equity, \$3,783,755; less Deferred Charges, \$571,253.
- (2) United States operations, \$6,163,414; plus General corporate assets and other, \$177,106.

Because the foregoing procedure does not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on the amounts listed above. In connection with this procedure, no matters came to our attention that caused us to believe that the amounts should be adjusted.

To the Board of Directors of United Technologies Corporation - 2 -

October 19, 1984

We performed no audit or other procedures with respect to the amount shown in the Letter for current closure and post-closure cost estimates. Accordingly, we do not express an opinion or any other form of assurance on such amount.

It is understood that this report is solely for your information and assistance in complying with the requirements of the Environmental Protection Agency - Subpart H of 40 CFR, Parts 264 and 265 and the regulations of authorized states, and should not be used for any other purpose.

Yours very truly,

Price Waterhouse

LIABILITY INSURANCE

RCRA Part B Permit Application United Technologies

Pratt & Whitney Aircraft CTD 990672081

This is to Certify that

UNITED TECHNOLOGIES CORPORATION, ETAL C/O R.G. Hugel, Assistant Treasurer United Technologies Building Hartford, Connecticut 06101



Name and oddress of March 22, 1985

is, at the date of this certificate, insured by the Company under the policy(ies) listed below. The insurance afforded by the listed policy(ies) is subject to all their terms, exclusions and conditions and is not altered by any requirement, term or condition of any contract or other document with respect to which this certificate may be issued.

| | TYPE OF POLICY | EXPIRATION DATE | POLICY NUMBER | LIMITS OF L | |
|-------------|--|--|-------------------|---------------------------------------|---|
| | WORKERS' | | | COVERAGE AFFORDED UNDER W.C. LAW OF | LIMIT OF LIABILITY COV B (Indicate Limit for each state) |
| | | | | MARITIME COVERAGE FOLLOWING STATES | LIMIT OF LIABILITY MARITIME COVERAGE |
| | | | | BODILY INJURY | PROPERTY DAMAGE |
| | COMPREHENSIVE | CONTINUOUS | RG1-612-004136-24 | \$ DECH | \$ OCCUREN |
| ' -{ | PRODUCTS COM. PLETED OPERATIONS Li HAZARDOUS W. | ASTE-PER ATT | ACHED ENDORSEMENT | \$ AGGREGATE | \$ AGGREGA |
| CHIE. | INDEPENDENT CON- TRACTORS (CONTRAC TORS PROTECTIVE | | | COMBINED SING BODILY INJURY AND PR | |
| | CONTRACTUAL | | | \$1,000,000 \$2,000,000 | EACH OCCURRENCE AGGREGATE |
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| AUTU | OWNED | | | \$ EACH PERSON S OR OCCURRENCE | \$ EACH ACCIDEN OR OCCUPEEN |
| <u> </u> | MIRED | | | S EACH ACCIDENT | -SINGLE LIMIT-BI AND P.D. COMBIN |
| OTHER | | | | , | |
| .004 | IONIS, OF OPERATIONS | JOB # (If Applicat | ; | DESCRIPTION OF OP | ERATIONS: |
| | SEE EXHII | BIT A | | | |

NOTICE OF CANCELLATION: (NOT APPLICABLE UNLESS A NUMBER OF DAYS IS ENTERED BELOW). BEFORE THE STATED EXPIRATION DATE THE COMPANY CANCEL OR REDUCE THE INSUFANCE AFFORDED UNDER THE ABOVE POLICIES AT LEAST 60 DAYS NOTICE OF SUCH CANCELLATION OR REDUCTION HAS BEEN ALED TO:

CONNECTICUT DEPARTMENT OF ENVIRONMENTAL
PROTECTION
Hazardous Waste Management Section
165 Capitol Avenue

Hartford, Connecticut 06106

AUTHORIZED REPRESENTATIVE
September 16, 1982 Glastonbury, CT

DATE ISSUED

HAZARDOUS WASTE FACILITY LIABILITY ENDORSEMENT

1. This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147.

The coverage applies at:

| Name and Address of Each Facility | EPA Identification Number |
|---|---------------------------|
| Pratt & Whitney Aircraft Group Colt Street, East Hartford, CT 06108 | CTD000844399 |
| Pratt & Whitney Aircraft Group 400 Main Street, East Hartford, CT 06108 | CTD990672081 |
| Pratt & Whitney Aircraft Group Pent Road (Willgoos), East Hartford, CT 06108 | CTD000845131 |
| Pratt & Whitney Aircraft Group Pine Street, Manchester, CT 06040 | CTD000844324 |
| Pratt & Whitney Aircraft Group Aircraft Road, Middletown, CT 06457 | CTD003935905 |
| Pratt & Whitney Aircraft Group 415 Washington Ave., North Haven, CT 06473 | CTD001449511 |
| Pratt & Whitney Aircraft Group Dividend Road, Rocky Hill, CT 06067 | CTD000844407 |
| Pratt & Whitney Aircraft Group Aircraft Road, Southington, CT 06489 | CTD001149277 |
| Pratt & Whitney Aircraft Group Newell St., (Service Center), Southington, CT 06489 | CTD000844332 |
| Power Systems Division/Fuel Cell Operations P.O. Box 109, South Windsor, CT 06074 | CTD010166791 |
| Hamilton Standard Complex B-1, 2 and 3 Hamilton Road, Windsor Locks, CT 06096 | CTD001145341 |
| Norden Systems Norden Place, Norwalk, CT 06856 | CTD089623318 |
| Sikorsky Aircraft South Avenue, Bridgeport, CT 06604 | CTD001449735 |
| Sikorsky Aircraft North Main St., Stratford, CT 06602 | CTD001449784 |
| United Technologies Research Center Silver Lane, East Hartford, CT 06108 | CTD095532131 |
| for sudden accidental occurrences. | |

Page 112 of 212 March 22, 1985

| The | limits of | liability are | \$ <u>1,000,000</u> | _each c | occurrence |
|-----|-----------|---------------|---------------------|---------|---------------------|
| | | | \$2,000,000 | _annual | l ag gregate |

exclusive of legal defense costs.

- 2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e):
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by the Commissioner of the Connecticut Department of Environmental Protection (DEP), the Insurer agrees to furnish to the Commissioner a signed duplicate of the policy and all endorsements.
 - (d) Cancellation of this endorsement, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Commissioner of the Connecticut Department of Environmental Protection (DEP) in which the facility(ies) is (are) located.
 - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Commissioner of the Connecticut Department of Environmental Protection (DEP) in which the facility(ies) is (are) located.

Attached to and forming part of policy No. RG1-612-004136-24 issued by Liberty Mutual Insurance Company, herein called the Insurer, of 175 Berkeley Street, Boston, Massachusetts 02117 to United Technologies Corporation of One Financial Plaza, Hartford, Connecticut 06101 this lst day of April, 1982. The effective date of said policy is the lst day of October, 1981.

Page 113 of 212 March 22, 1985

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Joseph/E./Anthony

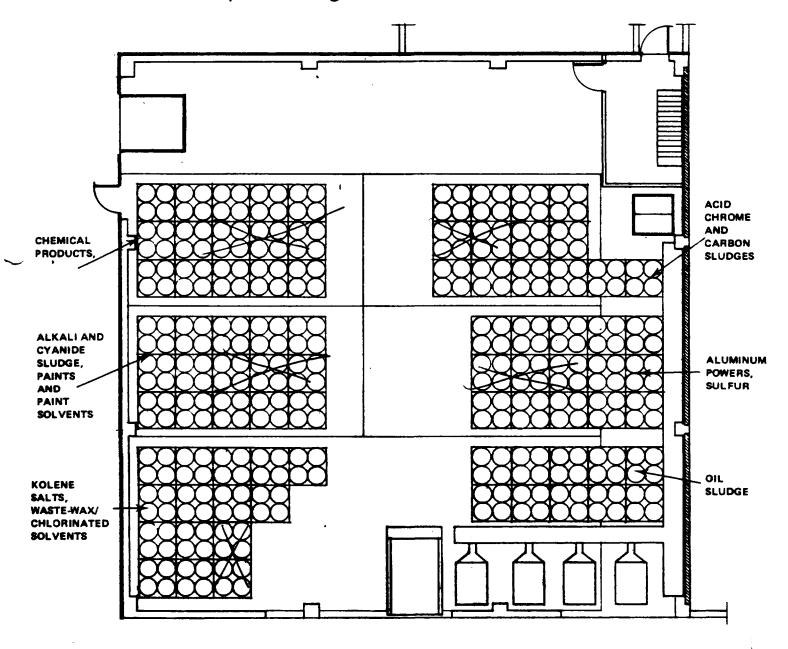
Assistant Vice President, Authorized Representative of

Liberty Mutual Insurance Company 20 Western Boulevard, Glastonbury, Connecticut 06033

D--- 3 -t 3

BARREL STORAGE BUILDING

Arrangement of Pallets for Storage of 1000 barrels, four to a pallet, 3 pallets high





Storage of Containers (Cont'd)

- 6) Accumulated liquids in the containment areas will be analyzed for the specific waste types present in the containment area. Liquids will then be manually pumped to the appropriate bulk storage tank for treatment.
- 7) A sample page from a computer report is included as Exhibit Z. This report will be used in conjuncton with the general inspection schedule to ensure that the 1000 drum maximum and the 350 drum maximum free-liquids is not exceeded. The total number of drums in storage will be determined weekly as specified in the inspection schedule. If the total number of barrels is found to be over 500, the computer report will be consulted to determine the total number of liquids barrels in storage. In the unlikely event that this number is approaching 350, off-site shipments of liquid drums will immediately be scheduled to reduce this number.
- 8) The aisle space in the container storage building is adequate for the hazardous wastes being stored there. The aisle spaces mark the seperation between each containment area and are sufficiently wide enough to allow unobstructed movement of personnel with fire or spill control equipment. For additional fire control, the open front of this building will allow quick overhead fire control practices. Any or all sections inside the building can easily be covered with foam or water from P&W fire department vehicles.

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Storage of Containers (Cont'd)

4) Aisle space is not needed because of the openness of this area, and the nonflammability of the wastes. This area can be easily reached by all fire control and spill containment equipment.

Page 212 of 212 March 22, 1985

CERTIFICATION

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalities for submitting false information, including the possibility of fine and imprisonment."

UNITED TECHNOLOGIES CORPORATION

Pratt & Whitney Group

Manufacturing Division

DATE March 21, 1985

SIGNATURES

EXECUTIVE VICE PRES.
(AS WRITTEN ON PART A)

REVISED: March 22, 1985

RCRA Part B Permit Application United Technologies Pratt & Whitney CTD 990672081

APPENDIX I

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) HAZARDOUS WASTE MANAGEMENT FACILITY - PART A APPLICATION REVISION

This RCRA Part A Application revision is required to be consistent with the Part B Application submission. The following is a summary of the changes and reasons they were made:

- 1. All treatment tanks (process code TO1) have been removed, due to exclusions under 40 CFR 122.21(d)(2)(vi) and 264.1(g)(6).
- 2. The rotary kiln incinerator listed in the November 19, 1981 previous Part A revision has been removed from the application. This incinerator will not burn any hazardous waste.
- Section IV "Description of Hazardous Wastes" has been revised according to latest regulations.
- 4. Section III surface impoundments (process code SO4) has been deleted from the November 18, 1980 Part A Application in both this revision and our previous revision dated November 19, 1981. No wastes were added to any of the impoundments since 1976. The impoundments were emptied and the wastes were reprocessed through the P&W Colt Street site (EPA ID No. CTD 00844399) for storage and subsequent disposal at the PWA Metal Hydroxide Landfill in Middletown, Connecticut (EPA ID No. CTD 003935904).
- 5. Section IV "Description of Hazardous Wastes" has been revised to include information inadvertently omitted from the previous revision.

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| FIRST OR REVISED APPLICATION | |
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| III. PROCESSES — CODES AND DESIGN CAPACITIES | |
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| entering codes. If more lines are needed, enter the code(s) in the green describe the process (including its design capacity) in the space provide | |
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PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "TV4"), FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

2.2

PRESCRIPTION OF BAZARDAS

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JUNIT OF MEASURE — For each quantity emered in column 3 en

ENGLISH UNIT OF MEASURE
POUNDS.

of facility records use any other unit of messure for quantity, a secount the appropriate density or specific gravity of the weste.

D. PROCESSES

4. PROCESS CODES:

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NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE more than one EPA Hazardous Waste Number shall be described on the B

- 1. Select one of the EPA Hazardous Warje Numbers and enter it in its quantity of the waste and describing all the processes to be used to be 2. In column A of the next line enter the other EPA Hazardous finding wincluded with above" and make no other entries on that line.
- 3. Repeat sup 2 for each other EPA Hear doug Waste Number

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A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

